

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

GEORGE A. JACKSON, et al.,)
)
 Plaintiffs,)
)
 v.) Civil Action No. 05-823-*** (MPT)
)
STANLEY TAYLOR, et al.,)
)
 Defendants.)

FILED
CLERK U.S. DISTRICT COURT
DISTRICT OF DELAWARE
2007 OCT -1 AM 10:45

CERTIFICATION

At Wilmington this ^{1st} day of October, 2007;

I, Nancy Rebeschini, Esquire, pro se law clerk, and designated officer for depositions upon written questions held before me on September 26, 2007, do here by certify that:

1. The deposition of Robert Manuel was held on September 26, 2007, at the J. Caleb Boggs Federal Building, Wilmington, Delaware.

2. On that same date, Robert Manuel declared before me, an individual authorized to administer oaths, that his written answers were true and correct.

3. I read aloud each and every deposition question submitted by plaintiff, George A. Jackson, for deponent, Robert Manuel.

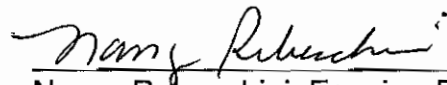
4. I personally observed deponent, Robert Manuel, answer in writing, the deposition questions.

5. A true and correct copy of the written questions filed by plaintiff, the original written answers of deponent, and written original objections made by his counsel are attached hereto and are filed with the court, and copies shall be served upon the parties

and the deponents.

I, Nancy Rebeschini, certify under penalty of perjury that the foregoing is true and correct.

Executed this 1st day of October, 2007.




Nancy Rebeschini, Esquire, Designated
Officer

CERTIFICATE OF SERVICE

I hereby certify that on October 1, 2007, I caused to be electronically filed the attached Certification with the Clerk of the Court using CM/ECF, which will send notification of such filing to Eileen Kelly, Esquire, counsel for defendants. I further certify I caused a true and correct copy of the attached Certification to be served via U.S. mail on plaintiffs: George A. Jackson, SBI No. 171250, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Darus Young, SBI No. 282852, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Charles Blizzard, SBI No. 166670, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Frank Williams, SBI No. 261867, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Roy R. Williamson, SBI No. 291856, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Anthony Morris, SBI No. 300363, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Carl Walker, SBI No. 173378, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Samuel Jones, SBI No. 465297, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Darwin A. Savage, SBI No. 232561, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Adrain Wright, SBI NO. 169921, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Gilbert Williams, SBI No. 137575, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Charles B. Sanders, SBI No. 160428, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Joseph White, SBI No. 082985, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Timothy L. Malloy, SBI No. 171278, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Howard Parker,

SBI No. 165324, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Kevin Spivey, SBI No. 258693, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; James Johnson, SBI No. 155123, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Vernon Truitt, SBI No. 188191, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Roderick Brown, SBI No. 315954, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; José Serpa, SBI No. 350322, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Roger Thomas, SBI No. 292590, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; John F. Davis, SBI No. 263753, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Lawrence B. Dickens, SBI No. 124570, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Eldon Potts, SBI No. 211193, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Jerome Green, SBI No. 147772, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; and Rique Reynolds, SBI No. 266486, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947.


Nancy Rebeschini, Esquire,
Designated Officer

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

GEORGE A. JACKSON, et al.,

Plaintiffs,

v.

STANLEY TAYLOR, et al.,

Defendants.

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C.A. No. 05-823-***

PLAINTIFF GEORGE A. JACKSON'S WRITTEN DEPOSITIONS
TO DEPOSE DEFENDANT ROBERT MANUEL

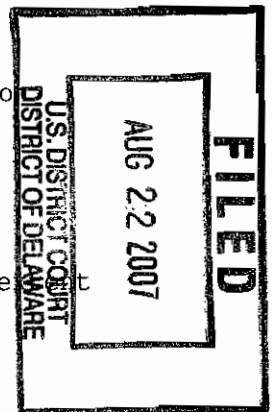
Plaintiff George A. Jackson, pro se, hereby depose defendant upon
Order of the Court:

GENERAL OBJECTIONS

1. Plaintiff objects to the deposing of the defendants to the extent
of written depositions. Just for the record.

WRITTEN DEPOSITIONS

1. How long have you been employed with the Delaware Department of Corrections?
2. Are you under the influence of any medication?
3. Have you had a chance to review the Amended Complaint, your "Response to Plaintiffs' Interrogatories", and any previous statements you given to defendants' counsel or any one else in connection with this case before coming here today?
4. Have you had a chance to meet and discuss the case with defendants' counsel?
5. Do you realize that you are under oath, just as if you were at trial testifying?
6. Is there any reason you can't give your best testimony today?



RD scanned

7. Have you ever completed any accredited program on food safety, personal hygiene, preparation, cooking, proper cleaning and sanitizing before July 1, 2005? If yes, please state the name of the accredited program and the date of completion.

8. Do you agree or disagree. When a person is working under conditions that exhibits excessive heat and high humidity, a person body works at a much higher stress level due to the lack of oxygen in the air?

9. Since you have worked at the SCI kitchen, when an inmate complain of any illness, does the SCI food service staff diagnose the inmate worker, or is he refer to the medical unit to be examined by the proper authorized personnel?

10. In your "Response no. 2 to Plaintiffs' Interrogatories", you alleged that no inmate complain to you about the excessive heat and high humidity at the SCI kitchen. Have you witness excessive heat and high humidity during the days when numerous of ovens are being used to cook burgers, french fries or even fish?

11. Are you aware that on the back of the convectional ovens, there is a small plated sign which "warns" do not operate unless under a properly working ventilation hood system.

12. During the hot summer months when temperatures rise and/or exceeds 100 degree, what precautionary instructions are told to the kitchen inmates during these hot days?

13. Are you aware there are only one (1) toilet for 22-25 inmates workers to use, despite being told to drink plenty of liquid by SCI staff food service personnel.

14. Are you aware that inmate kitchen workers are force to wait longed periods to use the one (1) seat bathroom, and through the years some inmates have urinate in the drains of the trayrooms?

15. When inmate kitchen workers was housed in the air condition cool if they refused to work to work or get fired, would that inmate received a major disciplinary report (class I), and immediately moved to a lesser desireable housing unit?

GEORGE JACKSON
INM BLDG. 1100
SUSSEX CORRECTIONAL INSTITUTION
P.O. BOX 500
GEORGETOWN, DELAWARE 19347

U.S. District Court
Clerk of Court
Lock box 18
BH HINKINS ST.
Wilmington, ~~DE~~ 19801

Robert Manuel

9-26-07

- 1) 6 yrs Gmo.
- 2) NO
- 3) yes
- 4) yes
- 5) yes
- 6) NO
- 7) yes SerSafe 2004
- 8) Do not know I'm not a doctor and some people's tolerance is different
- 9) He is referred to medical
- 10) The kitchen is hot
- 11) Do not know
- 12) Inmate are told to drink plenty of water and if feel sick or dizzy contact an officer
- 13) yes
- 14) Aware there is one bath room but do not know about anyone's urination in kitchen
- 15) If inmate is scheduled to work he must show up to work. If he does not report for work a class write would be done. If inmate received 3 class two write he will occur points ~~to~~ and may have to move out of next building.



Robert Manuel

9/26/07

Eileen Kelly, Esq. DAG

3. Objection.

4. Objection. Instruct witness not to provide any information regarding discussions with me (Eileen Kelly) or Catherine Damavandi.

10. Objection. We haven't been provided with interrogatories and witness hasn't seen question. Instruct him to answer to best of ability.

Eileen Kelly, DAG

9/26/07